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Proposed Attorneys for Chapter 11 Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA  
(SACRAMENTO DIVISION)**

In re:

MATTERHORN GROUP, INC.,

Debtor.

VITAFREZE FROZEN CONFECTIONS,  
INC.,

Debtor.

DELUXE ICE CREAM COMPANY,

Debtor.

- ☒ Affects ALL DEBTORS  
☐ Affects only MATTERHORN GROUP, INC.  
☐ Affects only VITAFREZE FROZEN  
CONFECTIONS, INC.  
☐ Affects only DELUXE ICE CREAM COMPANY

[Proposed] Lead Case No. 10-39672 (MSM)  
[Proposed] Jointly Administered with Case  
Nos. 10-39664 (MSM), and 10-39670 (MSM).<sup>1</sup>

DC No. LNB-4

Chapter 11 Cases

**CERTIFICATE OF SERVICE**

Hearing:

Date: TBD

Time: TBD

Place: Department A  
Judge Michael S. McManus  
Courtroom No. 28  
Floor No. 7  
Robert T. Matsui Courthouse  
501 I Street  
Sacramento, CA 95814

<sup>1</sup> Motion for Joint Administration pending.

**PROOF OF SERVICE**  
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am an employee in the County of Los Angeles, State of California. I am over the age of 18 and am not a party to the within action; my business address is: 10250 Constellation Blvd. Suite 1700, Los Angeles, California 90067.

On July 27, 2010, I served the foregoing document(s) described as

**NOTICE OF DEBTORS' EMERGENCY MOTION FOR ENTRY OF AN ORDER AUTHORIZING DEBTORS TO PROVIDE ADEQUATE ASSURANCE OF PAYMENT TO UTILITY COMPANIES PURSUANT TO SECTION 366(c) OF THE BANKRUPTCY CODE**

**DEBTORS' EMERGENCY MOTION FOR ENTRY OF AN ORDER AUTHORIZING DEBTORS TO PROVIDE ADEQUATE ASSURANCE OF PAYMENT TO UTILITY COMPANIES PURSUANT TO SECTION 366(c) OF THE BANKRUPTCY CODE**

**EXHIBITS RE: DEBTORS' EMERGENCY MOTION FOR ENTRY OF AN ORDER AUTHORIZING DEBTORS TO PROVIDE ADEQUATE ASSURANCE OF PAYMENT TO UTILITY COMPANIES PURSUANT TO SECTION 366(c) OF THE BANKRUPTCY CODE**

**DECLARATION OF JENNIFER K. LOVING IN SUPPORT OF DEBTORS' EMERGENCY MOTION FOR ENTRY OF AN ORDER AUTHORIZING DEBTORS TO PROVIDE ADEQUATE ASSURANCE OF PAYMENT TO UTILITY COMPANIES PURSUANT TO SECTION 366(c) OF THE BANKRUPTCY CODE**

**MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF THE DEBTORS' EMERGENCY MOTION FOR ENTRY OF AN ORDER AUTHORIZING DEBTORS TO PROVIDE ADEQUATE ASSURANCE OF PAYMENT TO UTILITY COMPANIES PURSUANT TO SECTION 366(c) OF THE BANKRUPTCY CODE**

on the interested parties in this action by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid in the United States mail at Los Angeles, California, addressed as follows:

See Attached Service List:

  X   (By Federal Express/Overnight Mail) I caused such envelope to be delivered by Federal Express (or Express Mail), next business day delivery to the offices of those so designated on the attached list. Executed on July 27, 2010, at Los Angeles, California.

  X   (Federal) I declare that I am an employee in the offices of a member of the State Bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

/s/ Lourdes Cruz  
Lourdes Cruz

Matterhorn, et al.  
File No. 4077  
RSN

Tania Moyron  
Willoughby & Paseuzzi LLP  
400 Capitol Mall, Suite 1450  
Sacramento, CA 95814

Office of the United States Trustee  
501 I Street  
Sacramento, CA 95814-7306

MATTERHORN GROUP, INC.,  
Cold Storage Vendors

Americold  
Jill La Vine  
Unit 94  
PO Box 4500  
Salem, OR 97208

Americold,  
Attn: Ronald B. Hutchison, CFO  
10 Glenlake Parkway  
Suite 800, South Tower  
Atlanta, GA 30328

US Cold Storage  
Cher Raderchak  
PO Box 840373  
Dallas, TX 75284

US Cold Storage  
David Harlan, CEO  
Four Echelon Plaza,  
201 Laurel Road, Suite 400,  
Voorhees, NJ 08043

Nordic Cold Storage  
Claudia Crawford  
1802 Rome Highway  
Rockmart, GA 30153

Nordic Cold Storage  
Don Schoenl, Chief Executive Officer  
4300 Pleasantdale Road  
Atlanta, GA 30340

Eugene Freezing and Storage  
Quinn Ackerman  
PO Box 2006  
Eugene, OR 97402

Eugene Freezing and Storage  
Peter Lafferty, President/Agent  
310 SENECA RD  
PO Box 2006  
Eugene, OR 97402

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11676 Perry Highway  
First Floor - Suite 1100  
Wexford, PA 15090

3 Rivers  
ROBERT M. CURRENT, Agent  
2120 East Washington Blvd., Suite B  
Fort Wayne, IN 46808

Hanson Cold Storage  
James Reits, Executive VP and CFO  
2900 S. State Street  
Suite 4  
Saint Joseph, MI 49085

Matterhorn, et al.  
File No. 4077  
Secured Creditors - Consolidated

KeyBank National Association  
702 W. Idaho Street  
Boise, ID 83702

Berry Plastics Technical Services, Inc  
1371 Chillicothe Road  
Aurora, OH 44202

Norse Dairy Systems, LLC  
1740 Joyce Avenue  
Columbus, OH 43219

Wells Fargo Bank, NA  
300 Tri-State Intl, Suite 400  
Lincolnshire, IL 60069

Boise Office Equipment  
Attn: Director/Officer/Legal Counsel  
330 N. Ancestor Pl, No 100  
Boise, ID 83704

KeyBank, N.A.  
Attn: Paul N. Harris, EVP Gral Counsel,  
Secretary  
127 Public Square  
Cleveland, OH 44114

Berry Plastics Corporation  
Attn: Ira G. Boots, Chair  
and CEO/Jim Kratochvil, CEO  
P.O. Box 959  
Evansville, IN 47706-0959

Norse Dairy Systems, LLC  
Attn: Ct Corporation System (Agent)  
1300 E. 9th Street  
Cleveland, OH 44114

Wells Fargo Bank N.A.  
Attn: James M. Strother,  
EVP, Gral Counsel  
420 Montgomery Street  
San Francisco, CA 94163

KeyBank, N.A.  
Attn: Thomas E. Nadon  
Asset Recovery Group-MS WA-31-18-0311  
601 108th Avenue, NE, 3rd Floor  
Bellevue, WA 98009-9027

KeyBank, N.A.  
c/o Randy Peterman  
Moffatt, Thomas, Barrett, Rock & Fields  
101 S Capitol Blvd, 10th Floor  
Boise, ID 83701-0829

DeLuxe  
File No. 4077  
Matterhorn

QCS Purchasing LLC  
2570 Solutions Center  
Chicago, IL 60677-2005

Garrett & Associates  
PO Box 980362  
Park City, UT 84098-0362

Berry Plastics Corporation  
Fifth Third Bank  
PO BOX 633485  
Cincinnati, OH 45263-3485

Americold Logistics LLC  
Unit 94  
PO Box 4500  
Portland, OR 97208-4500

Permacold Engineering, Inc.  
3005 NE Argyle Street  
Portland, OR 97211

Denali Ingredients, LLC  
Dept. 4004  
PO BOX 30516  
Lansing, MI 48909-8016

Global Sticks, Inc.  
13555-23A Avenue  
Surrey, BC V4A 9V1

Transilwrap Company, Inc.  
2434 Momentum Place  
Chicago, IL 60689-5324

Portland General Electric  
PO Box 4438  
Portland, OR 97208-4438

Boise Cascade Corporation  
Corrugated Container Division  
File # 1245  
San Francisco, CA 94160

Excelsior Packaging West  
Accounts Receivables dept  
159 Alexander Street  
Yonkers, NY 10701

Mohawk Plastics  
DBA AMPac  
PO BOX 692240  
Cincinnati, OH 45269

Larsen's Creamery Inc.  
16940 SE 130th  
Clackamas, OR 97015

Kaiser Foundation Health Plan  
PO Box 34178  
Seattle, WA 98124-1178

BoDeans Wafer Company  
1790 21st ST SW  
Le Mars, IA 51031

City of Salem Utility Billing  
Department of Public Works  
PO Box 2795  
Portland, OR 97208-2795

TATE & LYLE CUSTOM  
INGREDIENTS  
1891 Paysphere Circle  
Chicago, IL 60674

DeJarnett Sales Inc.  
45 82nd Drive Suite 49  
Gladstone, OR 97027

GRAPHIC PACKAGING  
PO BOX 404170  
Atlanta, GA 30384-4170

Contract Servicing  
PO Box 34623  
Seattle, WA 98124-1623

Matterhorn  
File No. 4077  
20 Largest

C H Robinson  
PO Box 9121  
Minneapolis, MN 55480-9121

Kraft Foods North America, Inc  
Cash Accounting, NF 123  
Three Lakes Drive  
Northfield, IL 60093

tailfordmitchell  
830 North Summit St  
Toledo, OH 43604

Food Lion  
PO Box 198135  
Atlanta, GA 30384-8135

TRANSAMERICA INSURANCE  
COMPANY  
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Los Angeles, CA 90030-0266

Just Born Royalty  
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Bethlehem, PA 18017-6672

Stoel Rives LLP  
101 S Capital Blvd  
Suite 1900  
Boise, ID 83702

Oregon Ice Cream  
13115 NE 4TH ST  
SUITE 220  
Vancouver, WA 98684

Aldrich Kilbride & Tatone LLC  
680 Hawthorne Avenue SE  
Suite 140  
Salem, OR 97301-5096

Mass Marketing Services  
Attn: John Carlson  
7851 Mission Center Ct #115  
San Diego, CA 92108

SnoTemp Cold Storage  
PO BOX 2066  
Eugene, OR 97402

Baker & Hostetler LLP  
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15th Floor  
Los Angeles, CA 90025-7120

Nordic Cold Storage, LLC  
1802 Rome Highway  
Rockmart, GA 30153

Integra Telecom  
PO Box 2966  
Milwaukee, WI 53201-2966

Yarnell Ice Cream  
205 S. Spring Street  
Searcy, AR 72143

Advantage Sales and Marketing  
P.O. Box 31001-1691  
Pasadena, CA 91110-1691

Big Y  
c/o Advantage Sales & Marketin  
300 Foxborough Blvd  
Foxboro, MA 02035

Daymon Worldwide  
Attn: John Stracuzzi  
P.O. Box 9661  
Uniondale, NY 11555-9661

Franklin C. Everett  
700 Bellevue Avenue  
Newport, RI 02840

John Hancock (USA)  
Dept 894109  
Los Angeles, CA 90189-4109

Vitafreeze  
File No. 4077  
20 Largest

Foster Farms  
Dept 33369  
PO BOX 44000  
San Francisco, CA 94144-3369

SMUD  
P.O. Box 15555  
Sacramento, CA 95852

Polly Ann Diversified, Inc.  
3138 Noriega Street  
San Francisco, CA 94122

Trojan Litho  
800 SW 27th St  
Renton, WA 98057

Graphic Packaging  
PO BOX 404170  
Atlanta, GA 30384-4170

Chemco Products Co.  
P.O. Box 21532  
Long Beach, CA 90801

Tetra Pak Hoyer  
P.O. Box 70235  
Chicago, IL 60673-0235

US Cold Storage, Inc.  
PO BOX 2067  
Fresno, CA 93718

NO Cal B&C Health & Welfare  
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221 Main - 2nd Floor  
San Francisco, CA 94145-0221

Sweetener Products  
P.O. Box 58426  
Vernon, CA 90058

QCS Purchasing LLC  
2570 Solutions Center  
Chicago, IL 60677

Global Sticks  
13555 - 23A Avenue  
Surrey, BC V4A 9V1

Sierra Packaging & Converting  
1400 Kleppe Lane  
Sparks, NV 89431

Sunopta Food Group  
Pacific Fruit  
36217 Treasury Center  
Chicago, IL 60694-6200

Norse Dairy Systems  
Attn:Interbake Foods 22439  
131 S. Dearborn St. 6th Floor  
Chicago, IL 60603

Sacramento Container Corp.  
Dept 33472  
P.O. Box 39000  
San Francisco, CA 94139

Kerry  
File 57038  
Los Angeles, CA 90074-7038

Capital Corrugated, Inc  
PO BOX 278060  
Sacramento, CA 95826

Apcco  
4812 Enterprise Way  
Modesto, CA 95356

Petro Chem Insulation, Inc.  
110 Corporate Place  
Vallejo, CA 94590



Matterhorn, et al.  
File No. 4077  
Utilities

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CenturyLink  
PO Box 4300  
Carol Stream, IL 60197-4300

City of Salem Utility Billing  
Department of Public Works  
PO Box 2795  
Portland, OR 97208-2795

Comcast  
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Seattle, WA 98124-1744

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PO BOX 2966  
Milwaukee, WI 53201-2966

NW Natural Gas  
PO Box 6017  
Portland, OR 97228-6017

Portland General Electric  
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Portland, OR 97208-4438

Qwest  
PO Box 29080  
Phoenix, AZ 85038-9080

Verizon Wireless  
PO Box 660108  
Dallas, TX 75266-0108

City Of Sacramento  
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Sacramento, CA 95812-2770

County of Sacramento  
Industrial Utility Billing  
9700 Goethe Road, Suite C  
Sacramento, CA 95827-3500

PG&E  
P.O. Box 997300  
Sacramento, CA 95899-7300

AT&T  
Payment Center  
Sacramento, CA 95887-0001

SMUD  
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Sacramento, CA 95852

Verizon Wireless  
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Dallas, TX 75266-0108

Waste Mgmt of Sacramento  
P.O. Box 78251  
Phoenix, AZ 85062-8251

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Milwaukee, WI 53201-2966

Pacific Telemanagement Service  
379 Diablo Road, Suite 212  
Danville, CA 94526

WM Lamp Tracker Inc.  
PAT  
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Atlanta, GA 31193-2962

CenturyLink  
PO Box 660068  
Dallas, TX 75266-0068

Cox Communications  
PO Box 53262  
Phoenix, AZ 85072-3262

Clear Voice Telecom  
1880 S. Coblat Point Way, Ste 300  
Meridian, ID 83642

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Integra Telecom  
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Milwaukee, WI 53201-2966

Paetec  
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Cedar Rapids, IA 52406-3177

Qwest  
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